

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

GARY DETMER,)
)
 Plaintiff,)
)
 v.) Case No. 4:19-cv-00151-SNLJ
)
 REAL TIME SOLUTIONS, INC.,)
)
 Defendant.)

JOINT PROPOSED SCHEDULING PLAN

Plaintiff Gary Detmer (“Plaintiff”) and Real Time Solutions, Inc. (“Defendant”), submit the following Joint Proposed Scheduling Plan in accordance with the Court’s Order dated February 20, 2019.

- (a) The Parties agree that Track 2 is appropriate in this matter.
- (b) Deadline for joining additional parties or amendment of pleadings: **April 1, 2019.**
- (c) Proposed Discovery Plan:
 - (i) Unless specifically requested in another format, any electronically stored information subject to disclosure under Fed. R. Civ. P. 30, 31, 33, 34 and 36 shall be reproduced in a printed form or in PDF format.
 - (ii) The Parties have not reached any agreement as to any claims of privileged materials.
 - (iii) The Parties will disclose information and exchange documents pursuant to Fed. R. Civ. P. 26(a)(1) on or before: **May 1, 2019.**
 - (iv) The Parties agree that discovery should not be conducted in phases or limited to any certain issues.
 - (v) Plaintiff shall disclose his expert witness(es)' identities and reports on or

before **May 31, 2019** and shall make such witnesses available for deposition by no later than **June 28, 2019**. Defendant shall disclose its expert witness(es)' identities and reports on or before **July 5, 2019** and shall make such witnesses available by **July 31, 2019**.

(vi) The parties agree that the presumptive limits of ten depositions per side and twenty-five interrogatories per party as set forth in Fed. R. Civ. P. 30 and 33, respectively, should apply in this case.

(vii) The Parties do not anticipate the need for physical or mental examinations in this case, but reserve the right to request them, pursuant to Rule 35, on or before **July 10, 2019**.

(viii) All discovery will be completed by **November 15, 2019**.

(ix) The Parties reserve the right to request protective orders in all appropriate situations which may arise, including, but not limited to, confidential, proprietary and trade secret business information and confidential protected health information.

(d) The Parties are agreeable to participating in alternative dispute resolution at the close of discovery.

(e) All motions to dismiss and motions for summary judgment must be filed on or before: **December 15, 2019**.

(f) The Parties agree that this case should be ready for trial by **March 31, 2020**.

(g) The Parties estimate it will take 2-3 days to trial this case to a verdict.

(h) There are no other matters the Parties wish to bring to the Court's attention at this time.

Respectfully submitted by,

DONNER APPLEWHITE

/s/ Steven A. Donner

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